

Laurent, David

From: Disher, Todd
Sent: Tuesday, September 10, 2019 4:25 PM
To: Nina Perales
Cc: Glenn Moramarco; Robins, Jeffrey (CIV); Biggs, Adam
Subject: DACA - Alabama Documents
Attachments: AL Docs.pdf

Nina,

Please see the attached document production from Alabama. These documents represent the non-privileged documents in the witnesses' possession, custody, or control that are responsive to your document requests attached to the deposition notices other than the communications between state agency personnel and counsel or persons acting at the direction of counsel. Alabama may supplement these documents if it identifies additional responsive documents.

Please note that the SAVE invoices include only one years' worth of costs incurred by Alabama. Alabama objects to having to provide any additional information for other years. Likewise, the Medicaid spreadsheet contains information going back to fiscal year 2015, the first year included in Ms. Felton's declaration. The personally identifying information has been redacted. Alabama objects to having to provide any additional information for other years. Asking for additional years as to the SAVE information or Medicaid information is not proportional to the needs of the case and outside the scope of discovery.

Additionally, Alabama will provide redacted communications and a privilege log at the time of the depositions.

Todd

/s/ Todd Lawrence Disher

Todd Lawrence Disher

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